



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

(N. S.) 1042, 78 Atl. 582; *Bolger v. Boston El. R. Co.*, 205 Mass. 420; *Feneff v. N. Y. C. & H. R. R. Co.*, 203 Mass. 278, 24 L. R. A. (N. S.) 1024, 89 N. E. 436. The common law never recognized any right of action in the wife analogous to the husband's action for loss of consortium, 3 BLACK, COM. 143; PECK, DOMESTIC RELATIONS 43; *Brown v. Kitselman* (Ind. 1912) 98 N. E. 631, 40 L. R. A. (N. S.) 236; *Stout v. Kansas City Terminal Ry. Co.* (Mo. App.) 157 S. W. 1019. Although it has come to be generally recognized that the wife can recover damages against one who maliciously alienates the husband's affections or who commits adultery with him. PECK, DOMESTIC RELATIONS 44; *Foot v. Card*, 58 Conn. 1, 6 L. R. A. 829; *Nolin v. Pearson*, 191 Mass. 283, 114 Am. St. Rep. 605, 4 L. R. A. (N. S.) 643, 6 Ann. Cas. 658; *Sims v. Sims*, 79 N. J. L. 577, 29 L. R. A. (N. S.) 842, 13 Harv. L. Rev. 490. And in *Flandermeyer v. Cooper*, 85 Ohio St. 327, 98 N. E. 102, 40 L. R. A. (N. S.) 360, a wife was allowed to recover damages for the loss of consortium of her husband against one who sold morphine to him in defiance of her wishes and with the effect of causing his insanity. *Clark v. Hill*, 69 Mo. App. 541 also allowed a wife to recover damages from a party who by persecution and threats caused the insanity of her husband. See also *Sims v. Sims*, 79 N. J. L. 577, 29 L. R. A. (N. S.) 842. It would seem that in no action based on negligence alone has the wife been allowed to recover for the loss of consortium. But where her injury flows from some affirmative act of the defendant her right to sue is being recognized.

MASTER AND SERVANT—CONSTRUCTION OF EMPLOYERS' LIABILITY STATUTES.—The Missouri Revised Statutes of 1909, § 7828, provide that belting, shafting, etc., when so placed as to be dangerous to employes while engaged in their ordinary duties, shall be safely and securely guarded. A belt in defendant's factory which was not guarded, broke, and plaintiff was injured by a blow from one of the loose ends. He brought an action based upon the statute. *Held*, the statute means that such dangerous appliances should be guarded only so as to prevent employes from being injured by coming in contact with them and not so as to prevent injury from accidental breakage. *Findlay v. Columbia Paper Box Co.* (Mo. 1913) 158 S. W. 22.

This is an original interpretation of such a statute, as other cases arising under similar statutes have all been decided upon a question of fact, namely: Was the unguarded appliance dangerous to employes while engaged in their ordinary duties? *Hindle v. Birtwistle*, 1 Q. B. 192; *Davidson v. Flour City Ornamental Iron Works*, 107 Minn. 17; *Snyder v. Waldorf Box Board Co.*, 110 Minn. 40; *Dillon v. National Coal Tar Co.*, 181 N. Y. 215. The principal case had been before the St. Louis Court of Appeals, and the court there intimated that the master was required to guard against breakage. *Strode v. Columbia Paper Box Co.*, 124 Mo. App. 511. Under similar statutes some courts have held that a liability arose from a failure to guard, even where the injury was caused by accidental breakage. *Davidson v. Flour City Ornamental Iron Works*, *supra*; *Richlands Iron Co. v. Elkins*, 90 Va. 249.